

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**LINDA DAYS,**

**Plaintiff,**

**v.**

**CROWN ASSET MANAGEMENT,  
LLC,**

**Defendant.**

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**Case No. 2:21-cv-477**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE THAT** on this date, Defendant Crown Asset Management, LLC, removes the above-captioned matter to this Court from the Court of Common Pleas for Allegheny County, and, in support thereof, aver as follows:

1. Defendant Crown Asset Management, LLC is the defendant in a civil action initiated by Writ of Summons on October 26, 2020, in the Court of Common Pleas for Allegheny County, titled *Linda Days v. Crown Asset Management, LLC*, and docketed to Case No. GD-20-011119 (“State Court Action”).
2. The Complaint was filed in the State Court Action on March 17, 2021.
3. This removal is timely under 28 U.S.C. § 1446(b) as Defendant was served with Plaintiff’s Complaint on or about March 23, 2021.

4. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all process, pleadings, and orders received by Defendant in the State Court Action.

5. The United States District Court for the Western District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

6. On this date, Defendant has provided notice of this removal to all parties and to the Court of Common Pleas for Allegheny County, Pennsylvania.

WHEREFORE, Defendants remove this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

**BARRON & NEWBURGER, P.C.**

By: /s/ Brit J. Suttell  
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Counsel for Defendant Crown Asset  
Management, LLC

Dated: April 13, 2021

**CERTIFICATE OF SERVICE**

I certify that on April 13, 2021, a true copy of the foregoing document was served on on the persons below via electronic means:

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Counsel for Defendant Crown Asset  
Management, LLC

Dated: April 13, 2021